## UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

HUISHAN CHEN,

Plaintiff,

v.

THE PARTNERSHIPS AND UNINCORPORATED ASSOCIATIONS IDENTIFIED ON SCHEDULE "A,"

Defendants.

Civil Action No. 2:24-cv-01516

Honorable William S. Stickman

JURY TRIAL DEMANDED

## NOTICE OF VOLUNTARY DISMISSAL PURSUANT TO F.R.C.P. 41(a)(1)(A)(i)

Pursuant to F.R.C.P. 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure, the plaintiff Huishan Chen, and or their counsel(s), hereby give notice that the following defendant listed in Schedule "A" of the above-captioned action is dismissed without prejudices.

• Huanyou Co. Ltd (Defendant No. 40)

Rule 41(a)(1)(A)(i) sets out that a Plaintiff may voluntarily dismiss its claims without prejudice and without a Court Order by notice at any time prior to the Defendants filing an Answer or moving for summary judgment. As of the filing of this Notice, no Defendant has filed an Answer in this action.

Dated: February 6, 2025

Respectfully submitted,

By: /s/ Xiyan Zhang Xiyan Zhang Stratum Law LLC 2424 E. York St. Ste. 223 Philadelphia, PA, 19125 Phone# (215) 395-8756 Bar# 5052642 xzhang@stratumlaw.com Counsel for Plaintiff